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September 19, 2023

Hon. John P. Cronan
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, N.Y. 10007

Re: *Thani A.T. Al Thani v. Hanke, et al.*, No. 20-cv-4765 (JPC)

Dear Judge Cronan,

We are counsel to Plaintiff Mohammed Thani A.T. Al Thani (“Plaintiff”) in the above-referenced matter and write pursuant to the Court’s Individual Rule 3(B) to request an extension of the deadline set by the Court in its Order dated September 6, 2023 (ECF No. 365, the “September 6 Order”), partially granting Plaintiff’s motion for sanctions against the Hanke Defendants.¹ As Your Honor is aware, in connection with the September 6 Order, the Court awarded monetary sanctions against the Hanke Defendants, and directed the undersigned to submit an affidavit and supporting material in furtherance of Plaintiff’s application for fees against the Hanke Defendants on or before September 19th. For the foregoing reasons, on behalf of Plaintiff, we respectfully request a ten-day extension to comply with the Court’s directive in the September 6 Order. The Hanke Defendants consent to this request, which is Plaintiff’s first request for an extension of this deadline.

As the Court found, the Hanke Defendants’ non-compliance occurred primarily in November 2020 through June 2021. It was during that time that the undersigned and other lawyers at Hogan Lovells US LLP (“Hogan Lovells”) were primary outside counsel to Plaintiff in this matter. Since that time, the undersigned became a partner in the law firm of Alston & Bird LLP, which is primary counsel for Plaintiff in this matter. And on September 13, 2023, the Court granted withdrawal motions for Hogan Lovell’s attorneys previously who had made appearances on Plaintiff’s behalf. As a result of the transition, the undersigned and relevant persons at Hogan Lovells have been coordinating cooperatively on the appropriate transfer of files. This process was ongoing at the time the Court entered its September 6 Order, but it is not complete, including the transfer of relevant billing records. While we have sufficient data to describe the incremental work necessary to compel compliance with the Court’s orders and the Federal Rules of Civil Procedure, the billing records are essential to quantify the incremental costs awarded by the Court. We believe that these

¹ The “Hanke Defendants” are Alan J. Hanke and IOLO Global LLC.

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records should be available in short order and, as such, Plaintiff respectfully requests this brief extension of time to comply with the September 6 Order.

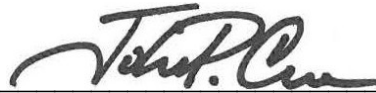
Sincerely,

/s/ Michael Hefter

Michael C. Hefter

The request is granted. Plaintiff shall submit an affidavit and supporting materials in furtherance of Plaintiff's fees application by September 29, 2023.

SO ORDERED.
September 20, 2023
New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan", written over a horizontal line.

JOHN P. CRONAN
United States District Judge